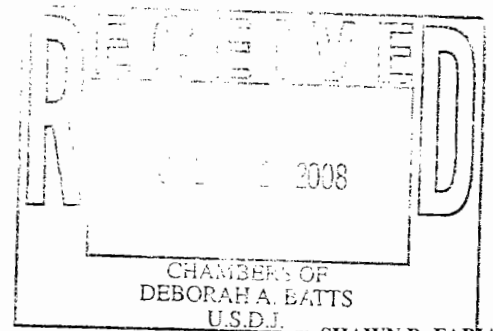


THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007



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July 1, 2008

**BY HAND DELIVERY**

Honorable Deborah A. Batts  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Juliet Jackson, et al. v. City of New York, et al., 08 Civ. 5025 (DAB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York ("City") in the above-referenced matter, in which plaintiffs allege, *inter alia*, that they were falsely arrested, maliciously prosecuted, unlawfully strip searched and that excessive force was used against them. Defendant City writes to respectfully request an enlargement of time to answer or otherwise respond to plaintiffs' complaint from June 30, 2008 until August 29, 2008. Plaintiffs' counsel, Brett Klein, Esq., consents to this request.

1 DAB/  
July 7, 2008  
Granted

There are several reasons for seeking an enlargement of time in this matter. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. As plaintiffs have alleged physical injury as a result of the events alleged in their complaint, our office is in the process of forwarding to plaintiffs for execution a consent and authorization for the release of medical records.

Further, it is our understanding that the records of the underlying criminal action, including police records, may have been sealed pursuant to New York Criminal Procedure Law § 160.50. Therefore, our office is in the process of forwarding to plaintiffs for execution a consent and authorization for the release of sealed arrest and criminal prosecution records so that

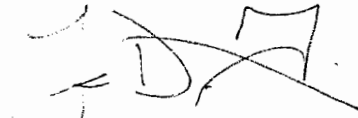
MEMO RECEIVED

defendant City can access the information, properly assess the case, and respond to this complaint.

No previous request for an enlargement to answer has been made by defendant City. Accordingly, defendant City respectfully requests that its time to answer or otherwise respond to the complaint be extended until August 29, 2008.

Thank you for your consideration herein.

Respectfully submitted,



Shawn D. Fabian (SF4606)  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Brett Klein, Esq. (By First Class Mail)  
Leventhal & Klein, LLP  
*Attorneys for Plaintiffs*  
45 Main Street, Suite 230  
Brooklyn, New York 11201

**SO ORDERED**  


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DEBORAH A. BATTS  
UNITED STATES DISTRICT JUDGE